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October 22, 2010

Honorable Alvin K. Hellerstein  
 United States District Court for the Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

The request to enlarge time to file  
 amended complaints is granted.  
 Amended complaints must be  
 filed by December 22, 2010.  
 SO ORDERED.

Re: World Trade Center Litigation Settlement Proposal

Order of October 14, 2010 (Dismissals without prejudice to replead)

Dear Judge Hellerstein:

*A. K. Hellerstein*  
21mc100, 21mc102, 21mc103      October 22, 2010

With reference to the recent Order of October 14, 2010 dismissing, *sua sponte*, many complaints in the World Trade Center dockets, a significant number of which were this firm's, we write to request an enlargement of time to replead beyond the thirty days as allotted for in said Order.

Our firm, as do all the plaintiff's firms, has multiple issues to resolve relating to the potential settlement plan, which has you know has filing dates shortly approaching. In fact, some of the dismissals relate to cases that are on the eligibility list. We have been intensely involved in conducting personal client meetings and continuously reviewing our client's records. Our staff's resources, which have been expanded, are being worn thin. Additionally, as the Court is aware Mr. Cannata and Mr. Grochow are involved in discussions with the Special Masters and the defense group in attempting a resolution of the off-site litigation including dockets 21MC102 (AKH) and 21MC2103 (AKH). The other plaintiffs firms, as well, have been involved in these discussions. Due to the nature of those discussions, a significant amount of time is being expended on corralling statistics and data relating to those cases.

We request that the time to replead our complaints recently dismissed, by Order dated October 14, 2010 without prejudice, be enlarged until December 22, 2010.

Respectfully,

s/  
 Gregory J. Cannata

s/  
 Robert A. Grochow

cc: Special Masters Twerski and Henderson, James E. Tyrell, esq.